

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

	x	
DAVIS INTERNATIONAL, LLC, HOLDEX,	:	
LLC, FOSTON MANAGEMENT, LTD, and	:	
OMNI TRUSTHOUSE, LTD,	:	
	:	
Plaintiffs,	:	
v.	:	Case No. 04-1482-GMS
	:	
NEW START GROUP CORP., VENITOM	:	
CORP., PAN-AMERICAN CORP., MDM	:	
BANK, URAL-GORNO METALURAGICAL	:	
COMPANY, EVRAZ HOLDING, MIKHAIL	:	
CHERNOI, OLEG DERIPASKA, ARNOLD	:	
KISLIN, MIKHAIL NEKRICH, and	:	
ISKANDER MAKMUDOV,	:	
	:	
Defendants.	:	

NOTICE OF CROSS-APPEAL

Notice is hereby given that Defendants New Start Group Corp., Venitom Corp., MDM Bank, Ural-Gorno Metallurgical Company, Evraz Holding, Mikhail Chernoi, Oleg Deripaska, Arnold Kislin, Mikhail Nekrich, and Iskander Makmudov cross-appeal to the United States Court of Appeals for the Third Circuit from the Order of the District Court of the District of Delaware dated March 29, 2006 denying Defendants' Motion to Enjoin Plaintiffs from Refiling this Action (DI No. 103).

Attorneys for Defendants Arnold Kislin:

/s/ Charles M. Oberly, III

Charles M. Oberly, III (ID No. 743)
 Karen V. Sullivan (ID No. 3872)
 Oberly, Jennings & Rhodunda, P.A.
 1220 Market Street, Suite 710
 PO Box 2054
 Wilmington, DE 19899
 (302) 576-2000

Lisa C. Cohen
 Schindler Cohen & Hochman LLP
 100 Wall Street
 15th Floor
 New York, NY 10005
 (212) 277-6300

Lawrence S. Goldman
Elizabeth Johnson
The Law Offices of Lawrence S.
Goldman
500 Fifth Ave., 29th Floor
New York, NY 10110-2900
(212) 997-7499

Attorneys for Defendants New Start Group
Corp. and Venitom Corp.:

/s/ Charles M. Oberly, III

Charles M. Oberly, III (ID No. 743)
Karen V. Sullivan (ID No. 3872)
Oberly, Jennings & Rhodunda, P.A.
1220 Market Street, Suite 710
PO Box 2054
Wilmington, DE 19899
(302) 576-2000

Richard J. Schaeffer
Peter J. Venaglia
Laura D. Sullivan
Dornbush, Schaeffer, Strongin &
Weinstein, LLP
747 Third Avenue, 11th Floor
New York, NY 10017
(212) 759-3300

Attorneys for Defendant Oleg Deripaska:

/s/ Collins J. Seitz, Jr.

Collins J. Seitz, Jr. (ID No. 2237)
Kevin F. Brady (ID No. 2248)
Connolly Bove Lodge & Hutz LLP
1007 North Orange Street
P.O. Box 2207
Wilmington, DE 19899
(302) 658-9141

Rodney F. Page
Bryan Cave LLP
700 13th Street, N.W.
Washington, D.C. 20005-3960
(202) 508-6002

Michael G. Biggers
Bryan Cave LLP
1290 Avenue of the Americas
New York, NY 10104
(212) 541-2000

Attorneys for Defendant Evraz Holding:

/s/ William M. Lafferty

William M. Lafferty (ID No. 2755)
Morris, Nichols, Arsh & Tunnell
Chase Manhattan Centre, 18th Floor
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899-1347
(302) 575-7341

David H. Herrington
Vitali Rosenfeld
Cleary Gottlieb Steen & Hamilton LLP
One Liberty Plaza
New York, NY 10006
(212) 225-2266

Attorneys for Defendant MDM Bank:

/s/ Richard I.G. Jones, Jr.

Richard I.G. Jones, Jr. (ID No. 3301)
Ashby & Geddes
222 Delaware Avenue, 17th Floor
P.O. Box 1150
Wilmington, DE 19899
(302) 654-1888

Joel B. Kleinman
David H. Greenberg
Dickstein Shapiro Morin & Oshinsky
LLP
2101 L Street NW
Washington, DC 20037-1526
(202) 785-9700

Attorneys for Defendant Ural-Gorno
Metallurgical Company:

/s/ Charles M. Oberly, III

Charles M. Oberly, III (ID No. 743)
Karen V. Sullivan (ID No. 3872)
Oberly, Jennings & Rhodunda, P.A.
1220 Market Street, Suite 710
PO Box 2054
Wilmington, DE 19899
(302) 576-2000

William H. Devaney
Venable LLP
405 Lexington Ave, Floor 62
New York, NY 10174
(212) 307-5500

Attorneys for Defendant Iskander
Makmudov:

/s/ Charles M. Oberly, III
Charles M. Oberly, III (ID No. 743)
Karen V. Sullivan (ID No. 3872)
Oberly, Jennings & Rhodunda, P.A.
1220 Market Street, Suite 710
PO Box 2054
Wilmington, DE 19899
(302) 576-2000

William H. Devaney
Venable LLP
405 Lexington Ave, Floor 62
New York, NY 10174
(212) 307-5500

Attorneys for Defendant Mikhail Chernoi:

/s/ Charles M. Oberly, III
Charles M. Oberly, III (ID No. 743)
Karen V. Sullivan (ID No. 3872)
Oberly, Jennings & Rhodunda, P.A.
1220 Market Street, Suite 710
PO Box 2054
Wilmington, DE 19899
(302) 576-2000

Brian Maas
Cameron A. Myler
Frankfurt Kurnit Klein & Selz PC
488 Madison Avenue, 9th Floor
New York, NY 10022
(212) 980-0120

Attorneys for Defendant Mikhail Nekrich:

/s/ Charles M. Oberly, III
Charles M. Oberly, III (ID No. 743)
Karen V. Sullivan (ID No. 3872)
Oberly, Jennings & Rhodunda, P.A.
1220 Market Street, Suite 710
PO Box 2054
Wilmington, DE 19899
(302) 576-2000

Paul R. Grand
Edward M. Spiro
Morvillo, Abramowitz, Grand, Iason &
Silberberg, P.C.
565 Fifth Avenue
New York, NY 10017
(212) 856-9600